

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)
)
)
V.) **CASE NO: 2:05-cr-175-T**
)
MARCUS JABOR ALLS)

UNOPPOSED MOTION TO CONTINUE

COMES NOW the Defendant, Marcus Jabor Alls, by and through the undersigned counsel, Donnie W. Bethel, pursuant to 18 U.S.C. 3161 §§ (h)(8)(A) and (h)(8)(B), and moves this Honorable Court for an order continuing the above-styled case to this Court's April trial term on the following grounds:

1. Defendant's trial is currently scheduled for January 23, 2006.
2. Undersigned counsel requires additional time to complete his investigation and adequately prepare for the trial of this case.
3. The United States, through Assistant United States Attorney Verne Speirs, has no opposition to a continuance.
4. A *Waiver of Speedy Trial*, pursuant to *Title 18 United States Code §3161*, was filed with this Court on August 18, 2005.
5. The ends of justice will be served by the granting of a continuance.

WHEREFORE, Defendant respectfully requests that this Motion be granted.

RESPECTFULLY SUBMITTED this 12th day of January, 2006.

Respectfully submitted,

s/ Donnie W. Bethel
DONNIE W. BETHEL
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CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2006, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Verne H. Speirs, Esquire
Assistant United States Attorney
One Court Square, Suite 201
Montgomery, Alabama 36104

Respectfully submitted,

s/ Donnie W. Bethel
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